

REMARKS

Reconsideration and allowance of this application are respectfully requested in light of the above amendments and the following remarks.

Claims 1-8 have been canceled in favor of new claims 9-15. Support for the amendments is provided, for example, in the original claims and the specification on page 16, lines 8-12, page 20, line 12, through page 23, line 22, and page 24, line 19, through page 26, line 20.

Claims 1 and 8 were rejected, under 35 USC §102(e), as being anticipated by Ramalho (US 7,284,068). Claims 2-7 were rejected, under 35 USC §103(a), as being unpatentable over Ramalho in view of Flinck (US 2004/0090942). To the extent these rejections may be deemed applicable to new claims 9-15, the Applicants respectfully traverse based on the points set forth below.

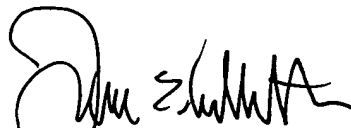
Claim 9 defines a mobile network control apparatus that maintains a plurality of interfaces between a mobile network and a global network. The mobile network control apparatus detects whether it is multi-homed and whether a packet tunneling failure of a first interface having a connection route to the global network exists. If a failure is detected and the mobile network control apparatus is not multi-homed, then the mobile network control apparatus searches for an alternative apparatus (e.g., a router) belonging to the mobile network that has a connection route to the global network and executes packet tunneling using an interface having a connection route to the alternative apparatus. If a failure is detected and the mobile network control apparatus is multi-homed, then the mobile network control apparatus searches for an alternative interface having the connection route to the global network and executes packet tunneling using the alternative interface.

The Office Action acknowledges that Ramalho does not disclose searching for an alternative apparatus (e.g., a router) belonging to a mobile network that has a connection route to a global network (see Office Action section 3, third paragraph) and cites Flinck for disclosing the discovery of alternative home agents (see section 3, fourth paragraph). Although Flinck may disclose finding an alternative home agent, this alternative is for the home agent, not for the egress interface of a mobile network control apparatus as recited in claim 9.

Accordingly, the Applicants submit that Ramalho and Flinck, considered individually or in combination, neither anticipate nor render obvious the subject matter defined by new claim 9. Independent claim 15 similarly recites the above-mentioned subject matter distinguishing apparatus claim 9 from the applied references, but with respect to a method. Therefore, allowance of claims 9 and 15 and all claims dependent therefrom is warranted.

In view of the above, it is submitted that this application is in condition for allowance, and a notice to that effect is respectfully solicited.

Respectfully submitted,



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